

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DANA SHAW
KAWAN MORGAN

CRIMINAL NO. _____

DATE FILED: _____

VIOLATIONS:

21 U.S.C. § 841(a)(1) (possession with
intent to distribute more than 5 grams of
cocaine base (“crack”) - 1 count)
21 U.S.C. § 841(a)(1) (possession with
intent to distribute cocaine base (“crack”)
- 1 count)
21 U.S.C. § 841(a)(1) (possession with
intent to distribute cocaine - 2 counts)
21 U.S.C. § 841(a)(1) (possession with
intent to distribute marijuana - 1 count)
18 U.S.C. § 924(c) (possession of firearms
in furtherance of a drug trafficking crime
- 1 count)
18 U.S.C. § 922(g)(1) (convicted felon in
possession of a firearm - 1 count)
Notices of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

DANA SHAW

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is, 9.46
grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a

Schedule II controlled substance.

_____In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DANA SHAW

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DANA SHAW

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DANA SHAW

knowingly possessed a firearm, that is, one .45 caliber Imbel (Springfield Armory), Model 1911-A1, semi-automatic pistol, S/N N342266, loaded with eight rounds of live ammunition; one .45 caliber Colt, Commander, semi-automatic pistol, S/N CJ10025, loaded with eight rounds of live ammunition; and one .223 caliber Professional Ordnance Inc., Carbon-15, semi-automatic pistol, S/N B26034, loaded with 45 rounds of live ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KAWAN MORGAN

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a), (b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KAWAN MORGAN

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a), (b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DANA SHAW,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, one .45 caliber Imbel (Springfield Armory), Model 1911-A1, semi-automatic pistol, S/N N342266, loaded with eight rounds of live ammunition; one .45 caliber Colt, Commander, semi-automatic pistol, S/N CJ10025, loaded with eight rounds of live ammunition; and one .223 caliber Professional Ordnance Inc., Carbon-15, semi-automatic pistol, S/N B26034, loaded with 45 rounds of live ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

NOTICE OF FORFEITURE
(21 U.S.C. § 853: DANA SHAW)

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

DANA SHAW

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

(1) one .45 caliber Imbel (Springfield Armory), Model 1911-A1, semi-automatic pistol, S/N N342266;

(2) one .45 caliber Colt, Commander, semi-automatic pistol, S/N CJ10025;

(3) one .223 caliber Professional Ordnance Inc., Carbon-15, semi-automatic pistol, S/N B26034;

(4) a total of approximately 37 rounds of .45 caliber ammunition and a total of approximately 45 rounds of .223 caliber ammunition, together with ammunition magazines;

(5) \$1,186 in United States currency;

(6) One 2000 Pontiac Montana, Pennsylvania Tag No. FJF-5861.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the

property listed in 1(a), above.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE
(18 U.S.C. § 924(d): DANA SHAW)

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

DANA SHAW

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offenses, including, but not limited to:

- (1) one .45 caliber Imbel (Springfield Armory), Model 1911-A1, semi-automatic pistol, S/N N342266;
- (2) one .45 caliber Colt, Commander, semi-automatic pistol, S/N CJ10025;
- (3) one .223 caliber Professional Ordnance Inc., Carbon-15, semi-automatic pistol, S/N B26034;
- (4) a total of approximately 37 rounds of .45 caliber ammunition; and
- (5) a total of approximately 45 rounds of .223 caliber ammunition, together with ammunition magazines.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 924(d).

NOTICE OF FORFEITURE
(21 U.S.C. § 853: KAWAN MORGAN)

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

KAWAN MORGAN

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

(1) \$155 in United States currency; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the property listed in 1(a), above.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON

PATRICK L. MEEHAN
United States Attorney for the
Eastern District of Pennsylvania